



SEALED

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FILED  
JUN 25 2024  
U.S. MAGISTRATE JUDGE  
BY \_\_\_\_\_

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12 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 GARY GERARD TOPOLEWSKI,

17 Defendant.

Case No 2:24-MJ- 558 -MDC

**GOVERNMENT'S MOTION TO  
SEAL COMPLAINT**

**(Filed Under Seal)**

19 The government respectfully moves this Honorable Court for an Order sealing the  
20 Complaint, this motion, and the Court's Sealing Order, in the above-captioned matter, until  
21 such time as this Honorable Court, or another Court of competent jurisdiction, shall order  
22 otherwise.

23 In this case, an order sealing the Complaint would be appropriate because the  
24 disclosure of the Complaint may alert the defendant of a pending arrest. Although the

1 defendant may be aware of the FBI investigation into his conduct, he is unlikely unaware of  
2 the extent of the investigation or of his imminent arrest. Accordingly, there is reason to  
3 believe that the disclosure of the information contained within the Complaint will give the  
4 defendant an opportunity to flee or continue flight from prosecution, or destroy or tamper  
5 with evidence.

6 Accordingly, there is reason to believe that notification of the existence of the  
7 complaint will seriously jeopardize the investigation and would likely place law  
8 enforcement at higher risk of confrontation when securing the arrest of the defendant.

9 DATED this 25th day of June, 2024.

10 Respectfully submitted,  
11 JASON M. FRIERSON  
United States Attorney

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14 RICHARD ANTHONY LOPEZ  
15 Assistant United States Attorney

16 SARA HALLMARK  
17 Trial Attorney  
U.S. Department of Justice  
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UNITED STATES OF AMERICA,

Plaintiff,

v.

GARY GERARD TOPOLEWSKI,

Defendant.

**FILED**

JUN 25 2024

U.S. MAGISTRATE JUDGE

Case No 2:24-MJ- 558 -MDC

**ORDER ON GOVERNMENT'S  
MOTION TO SEAL COMPLAINT**

**(Filed Under Seal)**

Based on the pending motion of the Government, and good cause appearing  
therefor, **IT IS HEREBY ORDERED** that the Complaint, the Government's motion, and  
this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order  
of the Court.

DATED this 25 day of June, 2024.

HON. MAXIMILIANO D. COUVILLIER, III  
UNITED STATES MAGISTRATE JUDGE